

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

S1 07 Cr. 541 (RPP)

- against-

DANIEL B. KARRON,

Defendant.

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**DEFENDANT DANIEL B. KARRON'S PROPOSED
EXAMINATION OF PROSPECTIVE JURORS**

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Cc: AUSA Kwok via ECF

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In the interests of judicial economy, the defendant has no objection to the Government's Proposed Examination of Prospective Jurors filed on May 14, 2008. The defendant Daniel B. Karron respectfully submits, pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure, that the Court include the following additional questions during voir dire.

Alternative Life-style testimony:

I anticipate their will be testimony relating to alternative lifestyles at this trial, specifically that Dr. Karron is a post-operative transsexual.

1. Do any of you have any opinion, bias, prejudice, or strong feelings about Homosexual or Transsexual individuals that might prevent you from weighing the evidence in a fair and impartial manner in this case?
2. Can you respect an individual's belief that he or she was born the wrong gender?
3. Would knowing the defendant underwent a sex-change operation prevent you from weighing the evidence in a fair and impartial manner in this case?

Testimony concerning Accounting Records:

I anticipate there will be testimony relating to Accounting records at this trial.

1. Have any of you or a member of your household ever owned your own business. If yes, were you responsible for the keeping of the financial records?
2. Have any of you or a member of your household ever been employed as an Accountant or Bookkeeper?
3. Does any member of the jury hold a degree in Accounting?
4. Has any member of the jury taken classes in Accounting?